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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

MALIBU MEDIA, LLC,

Plaintiff,

v.

Civil Action No. 2:14-cv-07611-KM-JBC

CHRIS FODGE,

Defendant.

/

**MOTION FOR ENTRY OF CLERK'S DEFAULT
PURSUANT TO FED.R.CIV.P 55(a)**

Pursuant to Fed.R.Civ.P. 55(a), Plaintiff moves for the entry of a default against Defendant, Chris Fodge, for failing to plead or otherwise defend this action as required by law. Attached hereto as Exhibit A is the Declaration in Support of Request for Entry of Default. Attached hereto as Exhibit B is the proposed Entry of Default.

Dated: August 11, 2015

Respectfully submitted,

By: /s/ Patrick J. Cerillo
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CERTIFICATE OF SERVICE

I hereby certify that on August 11, 2015, I electronically filed the foregoing document with the Clerk of the Court and all parties using the CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system.

I further certify that some of the participants in the case are not CM/ECF users. I have mailed the foregoing document via U.S. Mail to the persons set forth in the Service List below.

By: /s/ Patrick J. Cerillo
Patrick J. Cerillo, Esq.

Service List

Chris Fodge
136 N. 20th Street
Kenilworth, NJ 07033